

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

IN RE:) BANKRUPTCY CASE
)
John R Coughlin,) NO.: 20-00243
)
Debtor,) CHAPTER 13
)
) JUDGE: Donald R Cassling

Hearing: June 4, 2020
Time: 9:30 a.m.

**RESPONSE TO MOTION FOR LEAVE TO
SELL REAL PROPERTY**

Now Comes U.S. Bank National Association, by and through undersigned counsel, in response to Debtor's Motion for Leave to Sell Real Property stating as follows:

1. On January 6, 2020, the Debtor filed the instant bankruptcy petition under Chapter 13 of the Bankruptcy Code (11 U.S.C. Sec. 1301 et seq.)
2. U.S. Bank National Association services the mortgage lien on the real property located at 5723 W. 129th St., Apt. 9, Crestwood, IL 60445.
3. The terms of the Amended plan provide that the Debtor shall remit monthly mortgage payments directly to U.S. Bank National Association.
4. Debtor now seeks the Court's authorization to sell the property located at 5723 W. 129th St., Apt. 9, Crestwood, IL 60445.
5. Debtor's Motion indicates she has a purchase offer in the amount of \$64,000.00 with an anticipated closing date of April 29, 2020.
6. U.S. Bank National Association is not opposed to Debtor's Motion to Sell the property provided that the mortgage lien is paid in full pursuant to a contemporaneous payoff

statement secured at the time of closing.

7. Additionally, given the tentative nature of real estate sales, U.S. Bank National Association requests adequate protection payments until the sale is completed and for the sale to be completed within six months from entry of the Order permitting Debtor to sell the property located at 5723 W. 129th St., Apt. 9, Crestwood, IL 60445.

WHEREFORE, U.S. Bank National Association respectfully requests that this Court enter an Order permitting Debtor to sell the property subject to U.S. Bank National Association being adequately protected and paid in full, and for such other and further relief as the Court deems just and proper.

McCalla Raymer Leibert Pierce, LLC

By:

/s/Toni Townsend

Toni Townsend
Illinois Bar No. 6289370
1 N. Dearborn Suite 1200
Chicago, GA 60602
(312) 346-9088 X5174
Toni.Townsend@mccalla.com

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NOTICE OF FILING

To: See attached service list

PLEASE TAKE NOTICE THAT on May 27, 2020, U.S. Bank National Association filed the attached Response.

PROOF OF SERVICE

I, the undersigned Attorney, Certify that I served a copy of this Response to Motion to Allow Sale of Real Estate and Shorten Notice of Addresses attached by Electronic Notice through ECF or depositing the same in the United States Mail at 1 N. Dearborn Suite 1200, Chicago, IL 60602, at or before 5:00 p.m., on May 27, 2020, with proper postage prepaid.

***THESE DOCUMENTS ARE AN
ATTEMPT TO COLLECT A DEBT
AND ANY INFORMATION
OBTAINED WILL BE USED FOR
THAT PURPOSE***

/s/Toni Townsend
Toni Townsend
ARDC# 6289370
McCalla Raymer Leibert
Pierce, LLC
1 N. Dearborn Suite 1200
Chicago, IL 60602

SERVICE LIST

To Trustee:

Tom Vaughn

55 E. Monroe Street, Suite 3850

Chicago, IL 60603

by Electronic Notice through ECF

To Debtor:

John R Coughlin

2835 Gabrielle St

Apt. 310

Downers Grove, IL 60515

Served via U.S. Mail

To Attorney:

David M Siegel

David M. Siegel & Associates

790 Chaddick Drive

Wheeling, IL 60090

by Electronic Notice through ECF

McCalla Raymer Leibert Pierce, LLC

Attorney For: Creditor

1 N. Dearborn Suite 1200

Chicago, IL 60602

(312) 346-9088